

REMARKS

Reconsideration and allowance of the subject application are respectfully requested. By this Amendment, Applicant has added new claims 22-31. Thus, claims 1-31 are now pending in the application. Applicant respectfully submits that the pending claims define patentable subject matter.

As a preliminary matter, Applicant respectfully requests that the Examiner acknowledge receipt of the priority documents and the claim for foreign priority under 35 U.S.C. § 119 in the next action.

Claims 1-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ho (U.S. Patent No. 6,064,384). Applicant respectfully traverses the rejection.

Ho discloses a human-computer interface and method for simulating a book on a computer screen. *See, e.g.*, column 5, lines 50-53; column 6, line 38-40; FIG. 3; column 9, lines 47-56. Information and images are formatted to appear as pages of a simulated book. *See, e.g.*, column 17, lines 20-49; column 16, lines 23-25.

Whereas independent **claim 1** recites “a plurality of substantially sheet-like image display mediums bundled and integrated for displaying images...” and independent **claim 10** recites “bundling and integrating a plurality of substantially sheet-like image display mediums for displaying images...”, Ho discloses a *simulation* of display mediums on a conventional computer screen. The Examiner does not address this difference, instead treating the simulated pages as being *actual* display mediums.

During patent examination, the pending claims must be given their broadest reasonable interpretation consistent with the specification. *See* MPEP § 2111. The “book” display of Ho is a computer screen (*e.g.*, Ho column 9, lines 47-56), lacking the plurality of substantially sheet-like image display mediums recited in the independent claims, as well as each of the plurality of image display mediums having an image display screen as recited in claim 1. Moreover, the entire invention of Ho is the software portrayal of information as a book on a computer screen, combined with user interfaces to assist a user in browsing. Modification of Ho in order to meet the requirements of the claims would require a substantial reconstruction of Ho and a redesign of all of the elements, as well as change the basic principles under which Ho was intended to operate. *See generally* MPEP § 2143.01.

Accordingly, Applicant respectfully submits that the invention of independent claims 1 and 10 is not taught or suggested by Ho. In addition, while dependent claims 2-9 and 11-21 should be allowable at least by virtue of their dependency upon claims 1 and 10, Applicant respectfully submits that Ho does not teach or suggest the features of the dependent claims discussed below.

Regarding dependent claim 3, Applicant respectfully submits that Ho does not teach or suggest an image display mode setting device that includes a transparent input element provided on the respective image display screen of at least one image display medium. Ho describes in col. 22, lines 30 to 54 the browsing device 1000 which is shown in Fig. 10. The browsing device 1000 displays a thickness of a virtual computer book (a thickness of the right half portion of the virtually opened book) on a computer screen (see col. 22, lines 35 to 37). Over this portion of

the virtual book is provided the transparent force and position sensors 1006 so as to overlay the screen 1005, as described in col. 22, lines 49 to 51.

While claim 3 of the present application recites that a transparent input element is provided on an image display medium that displays an image by using an image data, in Ho, the transparent force and position sensor 1006 is provided over the screen 1005 in the browsing device 1000, which is quite different from an image display medium that displays an image. In addition, Ho does not disclose providing a transparent input element on each of a plurality of image display mediums, as required by claim 3.

Regarding dependent claims 4 and 12, Applicant submits that Ho does not provide any disclosure of utilizing page category information, as described on pages 39 and 40 of the present application. Ho does disclose organizing pages in a “scrap book” and into sections and chapters. *See* Ho column 24, line 57 to column 25, line 17 and FIG. 11B. However, rather than arranging and adjusting images onto image display mediums according to page category information *assigned to the image display mediums*, Ho’s section and chapter arrangement is based entirely upon information in the original files/windows, with no category indicia being assigned to (or otherwise associate with) the virtual pages.

Regarding dependent claim 5, the only data communication device that communicates with an external device or via a communication network identified in Ho is the bus 741 between browsing device 740 and computer input port 730. *See* Ho FIG. 7 and column 21, lines 29-37. Even so, the disclosed browsing-related signals transmitted over this bus do not suggest the transmission of image data, as required in claim 5.

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Regarding dependent claim 6, Applicant respectfully submits that Ho does not teach or suggest adjusting a display output of the display image according to a location environment.

Regarding dependent claims 8 and 9, Applicant respectfully submits that there is no teaching or suggestion of a lens sheet in Ho.

Regarding new dependent claims 22 to 31 which further describe the image display mediums with the feature of electronic papers, Applicant respectfully submits that the features of these are not taught or suggested by the virtual computer book of Ho.

In view of the above, Applicant respectfully submits that claims 1-31 should be allowable because the cited reference does not teach or suggest all of the features of the claims.

Reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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